

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,)	CRIMINAL NO. 19-888
)	
v.)	
)	
JUAN ROJAS HERNANDEZ,)	
)	
Defendant.)	
<hr style="border: 1px solid black;"/>)	

MODIFICATION OF BAIL CONDITIONS AS TO URGENT TRAVEL

COMES NOW the defendant, Juan Rojas Hernandez, by and through his undersigned counsel, Howard Brownstein, Esq., and with no response from Anthony Torntore, Assistant U.S. Attorney for the District of New Jersey, and Erika DiPalma, U.S. Pre-trial Services Officer, District of New Jersey, deferring to the the Court, states as follows:

1. Defendant, Juan Rojas Hernandez was arrested on November 5, 2019 on a criminal complaint. The Government moved to detain Mr. Rojas Hernandez on February 21, 2020 a formal detention hearing took place before United States Magistrate Judge James B. Clark, III.

2. On December 22, 2020, based on a Consent Order executed by Chief Magistrate Judge Mark Falk, the Defendant was released on a \$100,000.00 unsecured appearance bond, under home confinement and subject to location monitoring and ankle bracelet.

3. On April 22, 2021, the defendant entered a guilty plea with the Court.

4. The defendant has an urgent need to travel to Connecticut as his brother Roy Hernandez is in ICU in a coma at the Hartford Hospital located at 80 Seymour Street, Hartford Connecticut. The circumstances are being investigated as Mr. Rojas' other brother has died under the same circumstances. (See attached paperwork and picture)

5. Mr. Rojas will be traveling with a family member via automobile. He has expressed that it is urgent that he travels tomorrow, Friday, December 16, 2022 or at the latest on Sunday, December 18, 2022.

6. With no response having been received from AUSA Anthony Torntore, and with Erika DiPalma, U.S. Pretrial Officer deferring to the Court,, the defendant, Juan Rojas Hernandez, respectfully requests the conditions of bail be modified allowing him to travel to Connecticut as soon as it is possible, under supervision from U.S. Pre-Trial Services, District of New Jersey. Location to be verifiable and monitored by Pre-Trial Services.

7. All other conditions of bail shall remain the same.

Respectfully Submitted,
BROWNSTEIN & ASSOCIATES, P.C.

By: /s/Howard B. Brownstein
HOWARD B. BROWNSTEIN

Dated: December 15, 2022

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,)	
)	
v.)	ORDER
)	
JUAN ROJAS HERNANDEZ,)	CR. NO.: 19-888
)	
Defendant.)	
)	

THIS CASE came before the Court on an application to modify conditions of bail, allowing the defendant, Juan Rojas Hernandez, to travel to Connecticut under emergent circumstances. The Court having reviewed the pertinent information and being duly advised, it is hereby,

ORDERED and ADJUDGED that the application to modify conditions of bail, permitting the defendant to travel out of state to Connecticut under emergent circumstances is hereby _____; and it is further

ORDERED and ADJUDGED that defendant will be monitored by U.S. Pre-trial Services, District of New Jersey; and.

IT IS further ORDERED that all other conditions of bail shall remain the same.

DONE AND ORDERED in Chambers at the United States District Courthouse in the District of New Jersey, this _____ day of December 2022.
